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October 5, 2015

**BY ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Galanis et al., No. 15 Cr. 643 (PKC)

Dear Judge Castel:

We respectfully submit this letter on behalf of Defendants John Galanis and Derek Galanis to request the Court's approval of an expansion of their bail conditions.

On September 24, 2015, Magistrate Judge Ronald L. Ellis set bail for John Galanis and limited his travel to the Southern and Eastern Districts of New York and the Southern, Central, and Northern Districts of California. Judge Ellis ordered that the defendant meet his bail conditions by October 8, 2015.

Also on September 24, 2015, Magistrate Judge Sallie Kim of the Northern District of California set bail for Derek Galanis and limited his travel to the Northern and Southern Districts of California and the Southern and Eastern Districts of New York. Judge Kim ordered that the defendant meet his bail conditions by October 7, 2015. Judge Kim removed Derek Galanis's case to the Southern District of New York via an Order of Removal that was also dated September 24.

In order that both John and Derek Galanis be able to meet with family members who live in Massachusetts to obtain additional signatures in connection with the terms of their personal recognizance bonds, we respectfully request that Your Honor extend the

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deadline for the defendants to meet their bail conditions by seven days and that Your Honor additionally expand the conditions of their bail to allow travel to the District of Massachusetts. Both defendants would intend to travel to Massachusetts on October 8, 2015, and to leave Massachusetts on October 9, 2015.

I have conferred with Assistant United States Attorney Brian Blais and he has informed me that his office does not object to defendants' request to modify their bail conditions.

Should Your Honor have any questions in connection with this application, please do not hesitate to contact me.

Very truly yours,



Paul R. Grand

cc: AUSA Brian Blais (via email)